PHOENIX LAKE IRWM RETROFIT

Attachment 13 - Marin County Stormwater Resources Plan

The Marin County stormwater resources plan is known as the "Marin County Stormwater Pollution Prevention Program (MCSTOPPP). MCSTOPPP is a joint Countywide Program of the Cities of Belvedere, Larkspur, Mill, Valley, Novato, San Rafael, and Sausalito, the Towns of Corte Madera, Fairfax, Ross, San Anselmo, and Tiburon, the County of Marin, and the Marin County Flood Control District. Each agency pursues its own Local Program of stormwater pollution prevention activities and also contributes financial and in-kind support to the Countywide Program. Public Works Directors actively participate in discussions concerning the Countywide Program and the needs of the Local Programs through the Marin Public Works Association (MPWA). Expenses are apportioned among the municipalities according to a formula based on area and population.

Since May 20, 2004, MCSTOPPP has had State Water Resources Control Board's General Permit coverage for Stormwater Discharges from Small MS4s under Water Quality Order No. 2003-00005-DWQ (commonly referred to as the Phase II General Permit).

The activities are based on U.S. Environmental Protection Agency's (EPA) Phase II stormwater regulations as described in the Phase II General Permit, on precedents set by other countywide stormwater programs in the Bay Area, and on the results of discussions with San Francisco Bay Regional Water Quality Control Board (Water Board) staff. The result is a stormwater program tailored to the unique attributes of Marin County.

Program Structure and Activities

MCSTOPPP uniquely groups State and Federally mandated program requirements into categories that greatly facilitate communication and purpose so as to solicit and promote community participation and major stakeholder participation. To effectively implement a watershed focused and community based approach, Marin's cities, towns, and County governments must be in the "front line" of efforts to preserve and enhance the environment. Those categories are:

1. *Local Government Leads the Way*
2. *Caring for Our Creeks and Waterways*
3. *Building and Renewing*
4. *Educating Ourselves at Work*
5. *Educating Ourselves at Home and School*
6. *Water Quality Planning and Monitoring*

Local Government Leads the Way

MCSTOPPP refers to the Countywide Program and Local Programs. The program is integrated with the Bay Area Integrated Regional Water Management Plan through the North Bay Watershed Association and the Marin County Flood Control District under which the MCSTOPPP program is placed in the county administrative structure. Countywide Program activities are conducted for the benefit of all MCSTOPPP agencies. In addition to participating in Countywide Program planning activities, each MCSTOPPP agency must also implement a Local Program. The Countywide Program, jointly sponsored by the municipalities, conducts activities that benefit all Marin municipalities and it coordinates the implementation of Local Program tasks. For example, the Countywide Program carries out public education targeted to all Marin County residents, coordinates with other countywide, regional, and state agencies, and assists municipalities to implement their Local Programs to comply with the Phase II General Permit. The Countywide Program also facilitates a consistent, cost-effective approach to stormwater pollution prevention throughout Marin jurisdictions.

Activities under this heading for the program include:

- Administration
- Planning
- Financing
- Reporting

Caring for Our Creeks and Waterways

MCSTOPPP recognizes that the storm drain system – and stormwater pollution – begins with streets and gutters, whose drainage flows to ditches, to creeks and wetlands, and on to a bay or the ocean. MCSTOPPP's approach is to identify pollution and creek health problems and to involve citizens and agency staff with finding the solution. The need to preserve and enhance local waterways guides activities to control pollutant sources in the watershed. One of the goals for this chapter is for municipal staff to develop area-specific knowledge of local waterways to help direct Local Program day-to-day efforts.

MCSTOPPP uses a watershed approach to eliminate illicit discharges to storm drains. The "upstream" element is to inspect businesses and other likely dumping locations to identify potential sources of pollutants before they enter the drainage system. This effort is coordinated with MCSTOPPP's business inspection and outreach activities and public information and participation activities. The "downstream" element is to inspect gutters, swales, ditches, storm drain inlets, and storm drain outfalls as part of ongoing monitoring and maintenance of the drainage system, as described in this chapter. MCSTOPPP recognizes that the storm drain system – and stormwater pollution – begins with streets and gutters, whose drainage flows to ditches, to creeks and wetlands, and on to a bay or the ocean. MCSTOPPP's approach is to identify pollution and creek health problems and to involve citizens and agency staff with finding the solution. The need to preserve and enhance local waterways guides activities to control pollutant sources in the watershed.

MCSTOPPP meets the Phase II General Permit requirements under this heading through the following activities.

- Monitoring – Development and Construction Sites, Baseline Data Acquisition
- Biological Assessments – Ongoing Evaluation of the Biological Conditions of Waterbodies
- Illicit Discharge Detection, Elimination, And Enforcement
- Municipal Operations – Program Development and Employee Training

Building and Renewing

The Phase II General Permit addresses both construction related and long-term impacts of development projects. The Phase II General Permit requires that the stormwater management plan describe BMPs and associated measurable goals for both Construction Site Storm Water Runoff Control and for Post- Construction Storm Water Management in New Development and Redevelopment. The Phase II General Permit uses a two-pronged approach for handling stormwater issues related to post-construction controls. It has baseline requirements for all programs, but it also requires certain Local Programs (those serving a population over 50,000 or that are subject to high growth of at least 25 percent over ten years) to comply with more restrictive requirements as stated in Attachment 4 in the General Phase II Permit. Activities include:

- Construction Site Storm Water Runoff Controls
- Post Construction Development and Redevelopment
- Development and Implementation of Local Ordinances Requiring Use of BMPs

Educating Ourselves At Work

To mitigate impacts from commercial and industrial activities, Local Programs inspect and conduct educational outreach to businesses. Business inspections are coordinated with existing fire, building, or pretreatment inspection programs and the County Environmental Health Department. Activities include:

- Training Workshops for Local Program Inspectors
- Education Programs for Local Business Owners for Food Handling, Gas Stations, Dry Cleaners and other business with handling potentially polluting materials
- Coordination with the Marin County Environmental Health Department who may identify pollution sources during routine inspections
- Working with horse corral owners to insure proper management of manure and runoff
- Enforcement Coordination across jurisdictions to create a consistent standard throughout the County
- Training Workshops for Construction Trades personnel and business owners.

Educating Ourselves at Home and School

Public Education and Outreach on Storm Water Impacts and Public Involvement/Participation are two of the six Minimum Control Measures required in the Phase II permit. Under these

requirements, MCSTOPPP agencies must distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on creeks and waterways and the steps that the public can take to reduce pollutants in runoff. Activities include:

- Educational presentations in schools
- Workshops for Teachers and the public on creating healthy gardens and watersheds
- Printed Material created and made available for free to the public, e.g., brochures, calendars
- Consumer and residential guidelines for the use of less-toxic pest control methods
- BMP Guidance for restaurants, gas stations, etc.
- Website – http://www.mcstoppp.org
- Training workshops for nursery and garden shop owners
- STRAW Program – Students and Teachers Restoring a Watershed – Field work by students and teachers in removing non-native species and replacing with appropriate vegetation

Water Quality Planning and Monitoring

Since 1999 MCSTOPPP has been con-ducting benthic macro invertebrate (BMI) bioassessments because of their utility as indicators of the ecological health of creeks and associated water quality. Most recently, MCSTOPPP conducted bioassessments and physical habitat (PHAB) assessments during spring (April and May) 2009 at 12 creek sites in five Marin watersheds (Corte Madera Creek, Arroyo Corte Madera Del Presidio, San Geronimo Creek, Novato Creek and Miller Creek).

Bioassessments involve the collection, identification and quantification of Benthic Macro invertebrates (BMI, i.e. aquatic invertebrate animals that live in creek sediment). Put simply, those BMIs that are sensitive to pollution are expected to decrease in numbers whereas pollution-tolerant BMIs are expected to increase.

Performance Standards

MCSTOPPP developed performance standards to provide an effective, consistent, and predictable countywide approach to minimizing water quality impacts. Having consistent countywide standards assures similar treatment to businesses, developers, contractors, and property owners. Such standards also assist MCSTOPPP agencies with training and educational outreach activities. These performance standards are used as benchmarks for measuring the effectiveness of each agency's municipal maintenance activities, planning and permitting procedures, inspection and enforcement activities, and education and outreach activities.

The current “Performance Standards” are attached in Appendix A, which includes the following areas:

- Municipal Maintenance Activities, including Open Space and Creek Maintenance (Caring for Our Creeks and Waterways)

- Illicit Discharge Controls (Caring for Our Creeks and Waterways)
- New Development, Redevelopment, and Construction Controls (Building and Renewing)
- Industrial and Commercial Discharge Controls (Educating Ourselves at Work)
- Public Information and Participation (Educating Ourselves at Home and School)

A quick review of these standards further illustrates the breadth of the MCSTOPP Program and demonstrates all of the standards in the CWC Section 10560-10564 (known as the "Stormwater Resource Planning Act") are met.

APPENDIX A

PERFORMANCE STANDARDS

PERFORMANCE STANDARDS

Performance standards define a large part of what each agency will need to do to implement the Action Plan 2010 and comply with the municipal stormwater NPDES permit. The implementation of these performance standards by MCSTOPPP agencies is required by the Action Plan 2010 and serve as the required measurable goals for the NPDES permit.

Performance standards to be implemented by MCSTOPPP agencies have been developed for the following areas of the Action Plan 2010:

- Municipal Maintenance Activities, including Open Space and Creek Maintenance (Caring for Our Creeks and Waterways)
- Illicit Discharge Controls (Caring for Our Creeks and Waterways)
- New Development, Redevelopment, and Construction Controls (Building and Renewing)
- Industrial and Commercial Discharge Controls (Educating Ourselves at Work)
- Public Information and Participation (Educating Ourselves at Home and School)

Performance standards describe what each agency is responsible for achieving. Each agency will decide how it achieves these performance standards using its own staff, a contracted agency, or other arrangements. For ensuring effectiveness of new performance standards, each agency may need to collect data and provide it to the Countywide Program for review.

Regulatory Background

Since the early 1990's, the Regional Water Quality Control Board, San Francisco Bay Region's (Water Board) Water Quality Control Plan (Basin Plan) has required Marin municipalities to develop a plan for protecting stormwater quality discharges to San Francisco Bay and the Pacific Ocean. Federal stormwater regulations also required MCSTOPPP agencies to obtain a municipal stormwater permit by 2003. The Clean Water Act requires municipal stormwater programs to control discharges of pollutants to the maximum extent practicable (MEP) and to effectively prohibit illicit discharges.

MCSTOPPP represents the regional effort of Marin agencies to comply with these requirements. These performance standards are local program activities adopted by the Agency Staff Committee and define the MEP level of effort that each MCSTOPPP agency will attain to control pollutant discharges to the storm drains and creeks. Each agency is responsible for ensuring its local program meets the requirements of the Phase II NPDES General Permit by implementing the activities in Action Plan 2010 (a stormwater management plan) including these performance standards. The role of the Countywide Program is to provide guidance and assistance, as appropriate.

In addition to the state and federal requirements described above, MCSTOPPP agencies will also need to comply with federally mandated total maximum daily loads (TMDLs) assigned to stormwater discharges for certain pollutants. As an impaired water body, the San Francisco Bay can only assimilate certain amounts (or loads) of particular pollutants. The Water Board is responsible for defining TMDL limits for each impairing pollutant and assigning load and waste load allocations to different discharges to the Bay, including stormwater. These performance standards may be modified in the future to incorporate additional pollutant controls needed to comply with waste load allocations developed as part of the Water Board's TMDLs.

Performance Standards for Consistency

These performance standards provide an effective, consistent, and predictable countywide approach to minimizing water quality impacts. Having consistent countywide standards assures similar treatment to businesses, developers, contractors, and property owners. Such standards also assist MCSTOPPP agencies with training and educational outreach activities. These performance standards will be used as benchmarks for measuring the effectiveness of each agency's municipal maintenance activities, planning and permitting procedures, inspection and enforcement activities, and education and outreach activities.

The Countywide Program has the role of 1) advising Local Programs on whether they are meeting the agreed upon performance standards 2) providing requested assistance when performance standards are not being met 3) Periodically analyzing data collected by the local agencies to determine if the performance standards are proving effective, and 4) Working with the Local Programs and interested parties to modify the performance standards, if needed, based on the results of the effectiveness analysis or additional regulatory requirements. The status of each agency's implementation of the performance standards will be described in MCSTOPPP's Annual Reports to the Water Board. The Agency Staff Committee is responsible for resolving general problems with interpreting and attaining the performance standards, and for reviewing and updating them as needed, at least every two years.

Implementation Schedule

MCSTOPPP agencies first started formally implementing performance standards on July 1, 2000. Unless an implementation date is otherwise noted in parenthesis at the end of the performance standard, all MCSTOPPP agencies have already adopted and are currently implementing the performance standards. As a form of continual improvement, MCSTOPPP agencies have set up a tiered approach to implement additional performance standards as appropriate. The implementation deadline is noted at the end of these applicable performance standards.

Some of the performance standards apply only to those Local Programs that are required to meet the more prescriptive supplemental permit requirements for new and re-developments as stated in Attachment 4 in the General Phase II Permit or as required by the Water Board. Those performance standards to be implemented only by Marin County, Novato, and San Rafael are noted in parenthesis at the end of the performance standard as "Attachment 4 Agencies Only."

Municipal Maintenance

STREET SWEEPING

I. STREET SWEEPING FREQUENCY

1. Clean streets regularly, according to Table 1.

II. PROBLEMS ASSOCIATED WITH EFFICIENT STREET CLEANING

A. Getting Parked/Abandoned Vehicles Off Streets

1. Maintain a consistent sweeping schedule.
2. Take appropriate measures to keep curbed areas clear during street cleaning. Measures may include, but are not limited to, developing and distributing newsletters and other public education materials notifying residents and businesses of street sweeping schedules.

B. Vegetation

1. Investigate alternative leaf handling methods and implement an appropriate leaf removal program. Leaf removal programs may include but are not limited to the following:
   - Operating street cleaning equipment in tandem; and/or
   - Using leaf removal machine prior to cleaning; and/or
   - Using a front end loader with a dump truck prior to cleaning.
2. Encourage residents to collect and compost leaves through green waste program or coordinate with a local or regional composting program.
3. Provide adequate staff for conveniently reporting trees interfering with street cleaning operations (e.g. low over-hanging branches).

III. STREET CLEANING OPERATION TO MAXIMIZE POLLUTANT REMOVAL

1. Provide a clean looking street, free of dirt tracks, trails, or debris.
2. Check street cleaning equipment for proper adjustment.
3. Operate street cleaning equipment at the speed specified by the manufacturer.

IV. STREET CLEANING MAINTENANCE TO MAXIMIZE POLLUTANT REMOVAL

1. Regularly inspect and maintain street cleaning equipment.
2. Replace worn components as required to maximize efficiency.

V. SPILL RESPONSE

1. Report spills observed on streets immediately for quick response by appropriate personnel.
2. Respond to spills in accordance with response procedures described in the Storm Drain Facility Performance Standards.

VI. RECORD KEEPING

1. Track miles swept using a broom odometer or by tracking mileage only when cleaning. Do not include driver mileage to or from an area.
2. Track volume or weight of material removed for each street cleaning day.
3. Report the number of curb miles swept in monthly record keeping forms.
4. As needed, identify and target areas for: 1) more frequent cleaning throughout the year or just prior to the rainy season; 2) additional efforts to remove vehicles; 3) distribution of public education materials to discourage illegal dumping, etc.

5. Document and track areas where spills were reported and coordinate with your agency's illicit discharge control field surveys.

VII. CONTRACT SWEEPERS

1. Specify in contracts that compliance with these performance standards will be achieved.
2. Specify in contracts that in case of equipment failure, back up equipment must be available to ensure that the route is completed.
3. Specify in contracts that all information necessary for record keeping is provided.

VIII. EDUCATION/TRAINING

1. Train annually, municipal staff and contract sweepers responsible for street sweeping to identify and report illicit discharges, and to comply with the street sweeping performance standards.

STORM DRAIN FACILITIES

I. ROUTINE INSPECTION AND CLEANING[1]

1. Inspect and clean as necessary, storm drain facilities (inlets, culverts, and v-ditches) according to Table 1. The inspections and needed cleaning will preferably occur prior to the rainy season.
2. When cleaning storm drain inlets and lines, remove as much material as possible from the nearest access point to the inlet or area of line needing cleaning to minimize the potential for discharges to watercourses.

II. RECORD KEEPING

1. Report the amount of material removed when cleaning storm drainage facilities in monthly record keeping forms.
2. As needed, identify and target areas for: 1) more frequent cleaning throughout the year or just prior to the rainy season; and 2) distribution of public education materials to discourage illegal dumping, etc.
3. Document and track areas where spills were reported and coordinate with your agency's illicit discharge control field surveys.

Table 1. Summary Of Street Sweeping And Storm Drain Maintenance Practices

Municipality	Street Sweeping Frequency			Storm Drain Cleaning					
				Method			Frequency		
	R	C	I	H	V	SSA	R	C	I
Belvedere	1/wk	NA	NA	X	X	X	1/ yr	NA	NA
Corte Madera [a]	1/mo	1/ mo	1/ mo	X	X	X	1/ yr	1/ yr	1/ yr
Fairfax	1/mo	2/ wk	NA	X	X	X	b	b	NA
Larkspur Feb - Sep **Oct - Jan**	1/mo 2/mo	1/ mo 2/ mo	1/ wk	X	X	X	1/ yr	1/ yr	1/ yr
Marin County	1/yr	2/ yr	NA	X	X		1/ yr	1/ yr	NA
Mill Valley	1/mo	4/ mo	NA	X	X		1/ yr	1/ yr	1/ yr
Novato c	1/6 wk	1/ wk	1/ mo		X		1/ yr	1/ yr	1/ yr
Ross Oct - Mar **Apr - Sept**	2/6 mo 1/6 mo	NA	NA	X	X	X	1/ yr	1/ yr	NA
San Anselmo [d]	1/wk	1/ wk	NA	X	X		1/ yr	1/ yr	NA
San Rafael [e]	1/wk	1/ wk	1/ wk	X	X		1+/ yr	1+/ yr	1+/ yr
Sausalito	1/mo	3/ wk	1/ mo		X	X	1/ yr[f]	1/ yr[f]	1/ yr[f]
Tiburon	1/wk	1/ wk	1/ wk	X	X	X	2/ yr	2/ yr	2/ yr

R - Residential; C - Commercial; I - Industrial; H - by Hand; V - by Vactor; SSA - Street Sweeper Attachment

[a] Additional storm drain cleaning is conducted as needed; storm patrol during rain storms.

[b] As necessary/needed.

[c] City will be purchasing a system for better underground inspection of storm drains and catch basins.

[d] Seasonal: Full time fall and early winter—2 days/week; early Spring and after: 1 day/week.

[e] Storm drain cleaning debris reported 1/year

[f] Storm drain cleaning as needed; some storm drains/inlets are cleaned several times per week during wet weather.

III. SPILL RESPONSE (MULTIPLE AGENCIES INVOLVED)

1. If non-hazardous materials are spilled, maintenance staff will contain the spill area immediately and clean when practical to prevent additional release and discharge of pollutants into the storm drain system.

[1] For open channels and other natural watercourses, other permits and approvals (401 water quality certification, 404 permit, stream alteration agreement) may be necessary for certain activities, that should be coordinated prior to start of work

2. Maintenance staff will be aware and up to date on the agency's around-the-clock immediate response/removal procedure for hazardous or unknown materials
3. Maintenance staff will establish a response/removal procedure for non-hazardous materials after work hours.
4. Maintenance staff will coordinate with the Stormwater Coordinator to determine the most appropriate follow-up response (e.g., tracking the source of a spill, identifying product labels, contacting Building and Planning Departments, sending a clean-up bill to the responsible party, etc.).
5. Work with local Fire and Police Departments to provide copies of spill reports to the Stormwater Coordinator.

IV. DISPOSAL OF MATERIAL

1. Store material removed from storm drainage facilities on a concrete pad or other type of waterproof material. During the rainy season, also cover with waterproof material. Drain wastewater to the sanitary sewer or allow to evaporate to prevent discharges to the storm drain system. Dispose of the material at an appropriate facility.

V. ALTERNATIVE APPROACHES

1. Any agency may develop and submit to the Water Board a storm drainage facilities pollution control plan that proposes an alternative, but comparably effective approach, to these performance standards for controlling to the MEP, pollutants from storm drainage facilities maintenance. Any such plan containing alternative performance standards needs to obtain Water Board staff approval prior to being implemented.

OPERATIONS AND MAINTENANCE OF STORMWATER PUMP STATIONS

Stormwater Pump Stations in Marin County

The Marin County Flood Control District and five of the municipalities in Marin County (Corte Madera, Mill Valley, Larkspur, Novato and San Rafael) operate and maintain stormwater pump stations. All stormwater pump stations ultimately discharge to San Francisco Bay.

I. VISUAL INSPECTIONS

1. Inspect wet wells or forebays once per month during the dry season, and once per week during the wet season, for oil spills or other noticeable pollutant discharge.

II. MAXIMIZE REMOVAL OF POLLUTANTS PRIOR TO DISCHARGE

1. Conduct at least one comprehensive cleaning of wet wells annually to remove sediment prior to the start of the rainy season to minimize discharge of sediment. Clean wet wells with a vactor, if possible.
2. If there is a large potential for pollutant discharge, have a spill kit readily available.
3. Contain lubricants, fuel, and batteries to prevent accidental spills to wet wells.
4. If any spill is reported or observed, try to remove the material at the nearest access point. As practical, shut down the pump station if the material may reach it. (A storm event may necessitate operation of the pump station.) As possible, prevent spill from discharging.
5. Track spills upstream to try and locate the source(s) of pollution. Document spill incidents as part of the illicit discharge program. Implement enforcement, as appropriate.
6. Store oil absorbent materials in appropriate maintenance vehicles.

III. DISPOSAL

1. Dispose of screenings at a landfill, sediment at a location that will not re-enter the storm drain system or receiving waters through erosion, and oil-absorbed materials as hazardous waste.

IV. EDUCATION/TRAINING

1. Educate all personnel responsible for maintaining stormwater pump stations about these performance standards. Each agency will conduct at least one meeting (e.g., tail gate meeting) annually to educate pump station personnel about these performance standards and illicit discharge identification and reporting.
2. Conduct field training or other hand-on activities as part of the training, as appropriate.

LITTER CONTROL

I. SERVICES

1. Provide an adequate number of litter receptacles in commercial and other litter source areas. Agencies will make every effort to contain litter in receptacles.
2. Pick up litter receptacles on a frequent enough basis to minimize or prevent spillage.
3. Document and maintain the records monthly for 1) areas targeted for litter removal, and 2) total amount of material removed.

4. Review the records at least annually to determine problem areas for litter (overflowing receptacles areas of high litter accumulation; and improve services as appropriate. (July 2007)

II. EDUCATION AND ENFORCEMENT

1. Encourage public education efforts to include an anti-littering message, specifically:
   a. Residents to compost yard waste;
   b. Residents and businesses to remove litter from their property and properly containerize waste;
   c. Owners of loading docks, restaurants, and other litter source areas to sweep outdoor areas daily and properly containerize waste; and
   d. Municipalities provide a green waste program.
   e. Schools—especially those with open campus lunch periods.
   f. Street fair and other event coordinators to provide adequate waste and recycling containers, and encourage education of attendees.
2. Encourage local law enforcement personnel to post signs and enforce anti-littering laws especially for owners of vacant lots where litter accumulates.
3. Label litter receptacles with anti-littering messages when possible.
4. Encourage participation in and assist with the litter removal activities associated with the California Coastal Commission's annual Coastal Clean-up Day, Earth Day, or similar event(s).
5. Encourage maintenance crews to report any privately owned apparently abandoned vehicles that are leaking automotive fuels.

III. ALTERNATIVE APPROACHES

1. Any agency may develop and submit to the Water Board a litter control plan that proposes an alternative, but comparably effective approach, to these performance standards for controlling to the MEP, pollutants from littering sources. Any such plan containing alternative performance standards needs to obtain Water Board staff approval prior to being implemented.

CORPORATION YARDS

I. GENERAL STANDARDS/ TRAINING

1. Prepare and maintain a current Stormwater Pollution Prevention Plan (SWPPP).
2. For each corporation yard, assign one person the primary responsibility for ensuring that performance standards are implemented. This person will also be responsible for ensuring that all persons using the facility are aware of these performance standards. If different from the Stormwater Coordinator, this person will be listed as a contact in the annual report.
3. Prepare spill containment kits and store them in locations that have potential for spills (e.g., fueling areas, etc.). Conduct drills annually on how to use the kits, or as appropriate.
4. Stencil or otherwise mark inlets to the storm drainage system with a "no dumping" message.
5. Survey the facility annually for compliance with the performance standards. Any performance standard that has not been implemented will be identified in the annual report, along with a schedule for implementation.
6. Post educational materials about these performance standards and best management practices in appropriate areas.
7. Describe activities conducted to educate staff regarding the performance standards in the annual report.
8. Incorporate stormwater performance standards in annual updates of other environmental management plans (e.g., Hazardous Materials Business Plans, Spill Prevention Control and Countermeasure Plans, etc.). Periodically review these plans with persons using the facility.

II. GENERAL HOUSEKEEPING

1. Dispose of often, material removed from streets and storm drainage facilities to eliminate exposure to rainwater and runoff to the storm drain system.
2. Sweep the corporation yard at least monthly.
3. Keep chemical storage areas neat and orderly.
4. Stockpile materials away from streets, gutters, storm drain inlets, or water channels when possible.
5. Inspect the yard at least monthly to ensure that there are no illicit discharges to the storm drain system. During rain events, inspect the yard to ensure pollutant discharges are controlled to the MEP.

III. REFUSE HOLDING AREAS

1. If materials removed from storm drainage facilities are stored on site, store the materials on a concrete pad or other type of waterproof material. During the rainy season, also cover with a waterproof material. Drain wastewater to the sanitary sewer or allow to evaporate to prevent discharges to the storm drain system. Dispose of the material at an appropriate facility.

IV. AUXILIARY STORAGE AREAS/YARDS

1. Store chemicals in appropriate areas to prevent pollutant discharge to the storm drains.

V. CHEMICAL STORAGE

1. Store paint and other chemicals in an approved covered containment area. Design the floor so that spilled materials will be contained and easily removed. Keep all containers containing hazardous materials or waste closed when not filling or emptying. Label containers according to Department of Transportation regulations. Protect the area from vandalism.
2. If any material containers (not limited to hazardous material containers) are stored outside, keep the containers in a contained area that prevents discharge to the storm drain system from spills or exposure to rain. Ensure that all the containers are closed with tight-fitting lids. Design the area to prevent "run-on" of stormwater and runoff of spills.
3. Review the Material Safety Data Sheet (MSDS) to ensure that incompatible materials have the appropriate separation.
4. Review the Hazardous Material Business Plan for hazardous materials storage requirements.

VI. CHEMICAL USAGE

1. Ensure that necessary safety equipment and spill containment kits are readily accessible in areas where chemicals are used. Inspect safety equipment (e.g., eye wash) regularly to ensure they are operational.
2. Review MSDSs.
3. Minimize use of chemicals. Use water-based paints and non-toxic chemicals as much as possible.
4. Recycle or dispose of excess chemicals at an approved local Household Hazardous Waste Facility or other approved location.
5. Ensure chemical containers have secure lids and are tied down properly to the vehicle during transport.
6. Properly remove any soils contaminated with spilled materials.

A. Oil-based Paints

1. Wipe paint out of brushes. Filter and reuse thinners or dispose of as hazardous waste. Dispose of the excess paint as hazardous waste or recycle. If there is too much paint to dry, recycle the paint or dispose as hazardous waste.

B. Water-based Paints

1. Rinse paint out of brushes and discharge rinse water to the sanitary sewer. Recycle or dry excess paint in cans and dispose of the cans in the trash. If there is too much paint to dry, recycle the paint or dispose as hazardous waste.

C. Automotive Fluids

1. Collect used fluids and recycle or dispose at an appropriate facility.

D. Pesticides

1. Refer to the California Department of Pesticides Regulation for pesticide mixing, application, storage and disposal requirements.
2. Use integrated pest management methods. Given a choice, use the least toxic pesticides and herbicides that will accomplish the job. Avoid copper-based pesticides.
3. Apply pesticides at appropriate times to maximize their effectiveness and minimize their potential to run off.
4. Mix only as much pesticide as needed. Do not mix or load pesticides next to storm drain inlets or watercourses.
5. Once every three years, conduct a municipality-wide survey to determine the types and amounts of pesticides in use by municipal staff. (July 2006)
6. Within a year of completing the above survey, analyze the survey results and develop recommended alternatives for minimizing pesticide impacts. (July 2007)
7. Within two years of completing the survey, implement the recommendations resulting from the analysis of survey result (e.g., may involve updating or adopting an Integrated Pest Management ordinance). (March 2008)

E. Solvent /Cleaning Solutions

1. Properly recycle or dispose of used solvents/chemicals.

VII. WASHING VEHICLES/ EQUIPMENT

1. Clean all vehicles/equipment on designated wash areas that discharges washwater to the sanitary sewer or recycling system. (Wash areas might be off-site to ensure discharge to the sanitary sewer or recycling system.)
2. Ensure wash area and sump (if applicable) are large enough so that all washwater drains to the sanitary sewer or recycling system. If necessary, re-grade area or install dikes to convey the washwater.
3. Visually monitor the wash area to make sure it is consistently used (i.e., periodically inspect to ensure that vehicles are consistently cleaned in the wash area).
4. Consider assigning schedules for using the wash area, if appropriate.

VIII. FUEL DISPENSING AREAS

1. Store spill containment kits nearby. If spill occurs, use dry methods to clean and follow procedures in the Hazardous Materials Business Plan and/or Spill Prevention Control and Countermeasure Plan.
2. Train employees in proper fueling, cleaning, and spill response procedures. Conduct annual drills, as appropriate.
3. Install signs reminding people not to "top off" tanks.
4. Discourage mobile fueling. If mobile equipment is fueled with a mobile fuel truck, establish designated areas for fueling.
5. Consider covering fuel dispensing areas. Prohibit fueling over open ground; ground should be covered by concrete or asphalt protected with a sealant. Implement the *Retail Gasoline Outlets Best Management Practices* prepared for the California Stormwater Quality Task Force (March 1997), as appropriate.
6. Design the fueling area to prevent "run-on" of stormwater and runoff of spills.

IX. FLEET MAINTENANCE/VEHICLE PARKING AREAS

1. Inspect equipment for leaks on a regular basis. Use drip pans under leaking vehicles. Repair vehicles with significant leaks.
2. Drain and replace motor oil and other fluids in a covered shop area. If fluids are changed outdoors, designate an area where there are no connections to the storm drains, watercourses, or the sanitary sewer. Select a designated area where spills can be easily cleaned up.
3. Periodically dry sweep the area.
4. Schedule outdoor repair activities for dry weather, if possible. Prevent repair supplies or work material from entering storm drains or watercourses.
5. Clean equipment regularly using proper collection and disposal methods when necessary.

X. ALTERNATIVE APPROACHES

1. Any agency may develop and submit to the Water Board a corporation yard pollution control plan that proposes an alternative, but comparably effective approach, to these performance standards for controlling to the maximum extent practicable (MEP), pollutants from municipal corporation yards. Any such plan containing performance standards needs to obtain Water Board staff approval prior to being implemented.

ROAD REPAIR AND MAINTENANCE

I. GENERAL PRACTICES/ TRAINING

1. Schedule excavation and road maintenance activities for dry weather, if feasible.
2. Equipment or vehicle repairs, maintenance and fueling will be conducted in accordance with the Corporation Yard Performance Standards.
3. Recycle used motor oil, diesel oil, concrete, broken asphalt, etc. whenever possible.
4. Train annually municipal staff and contractors conducting road repair and maintenance to comply with these performance standards.
5. Distribute educational and outreach materials developed by the Water Board or the Countywide Program, as appropriate, to those utility contractors (e.g., water supply, cable, phone, electrical, etc.) seeking encroachment and/or grading permits from the agency.

II. ASPHALT/CONCRETE REMOVAL

1. After breaking up old pavement, remove and recycle as much as possible to avoid contact with rainfall and stormwater runoff.
2. Take measures to protect storm drain inlets prior to and during asphalt breaking or concrete saw – cutting operations (i.e., Block or berm around storm drain inlets using sand bags or an equivalent appropriate filter device, or absorbent materials such as pads, pillows, or socks to contain slurry. If slurry enters the storm drain system, remove the material immediately.) Remove saw-cut slurry (e.g., with a shovel or vacuum) before leaving at the end of the day, clean afterwards by sweeping or removing as much material as possible. [July 2006]

III. PATCHING AND RESURFACING

1. To minimize runoff from patching and resurfacing activities, materials will not be stockpiled in streets, gutter areas, or near storm drain inlets or creeks unless these areas are protected (i.e., stockpiled material should be covered to minimize stormwater runoff.)
2. Cover and seal manholes and storm drain inlets before applying seal coat, slurry seal, etc.
3. Never wash excess material from exposed aggregate concrete or similar treatments into a street or storm drain inlet. Designate an unpaved area for clean up and proper disposal of excess materials.
4. Use only as much water as necessary for dust control to avoid runoff.
5. Sweep up as much material as possible and dispose of properly. Wash down of streets is only permitted if runoff is controlled or contained.

6. Clean up spills and leaks from other equipment and work site areas using "dry" methods (absorbent materials and/or rags). Properly dispose of absorbent materials and rags. If spills occur on dirt areas, the contaminated soil will be removed properly and on a timely basis.
7. After the job is complete, remove stockpiles (asphalt materials, sand, etc.) and other extra materials as soon as possible.
8. If it rains unexpectedly, take appropriate action to prevent pollution of stormwater runoff (e.g., divert runoff around work areas).

IV. SIGNING AND STRIPING

1. Store spill absorbent materials on trucks to be used in the event of a spill.
2. Contain and clean up waste materials and dispose of them properly according to the MSDS.

V. EQUIPMENT CLEAN UP/STORAGE

1. Clean sprayers, patch and paving equipment at the end of the day. Use approved collection methods and dispose or recycle waste materials at an approved facility.
2. If stored outdoors, cover sprayers, patch and paving equipment, if they contain pollutants, to prevent rainfall from transporting pollutants to the storm drain system.
3. Flush paint sprayer supply lines at the corporation yard. Use approved collection methods and dispose or recycle waste materials at an approved hazardous waste facility.

OPEN SPACE PUBLIC WORKS

The performance standards in this section are designed to address the following types of maintenance practices:

- Road and trail construction, maintenance, and repairs in ways to prevent and control road-related and open space trail erosion; and,
- Other public works maintenance activities that can incorporate additional treatment measures to minimize the generation and discharge of sediment, and to minimize the degradation of creeks.

I. APPLICABILITY/GENERAL STANDARDS TRAINING

1. Each Local Program will determine if open spaces or rural roads are located within their jurisdiction and evaluate the applicability of these performance standards during the first year of implementation. [July 2006]
2. Each Local Program will adequately train maintenance staff in the use of appropriate open space and rural public works maintenance BMPs [e.g., see Attachment B and FishNet 4C "Guidelines for Protecting Aquatic Habitat & Salmon Fisheries for County Road Maintenance." (2004) available at www.mcstoppp.org; and BASMAA's "Flood Control Facility Maintenance Manual" (2000)]. [July 2007]
3. Each Local Program will provide outreach materials to appropriate contractors and staff on open space and rural public works maintenance BMPs, and requirements. [July 2007]

II. EROSION AND SEDIMENT CONTROL

1. Each Local Program will plan for proper erosion prevention and sediment control measures when designing rural roads or open space trails. [March 2008]
2. During rural road or open space trail construction, each Local Program will inspect the construction site and maintain construction erosion prevention and sediment control BMP's. [March 2008]

CREEK MAINTENANCE

The performance standards in this section are described to address the following types of maintenance practices.

- Management and/or removal of large woody debris and live vegetation from creek channels;
- Creek stabilization projects.

I. GENERAL STANDARDS TRAINING

1. Each Local Program will obtain the appropriate permits for maintenance activities occurring in or adjacent to stream channels.
2. Each local program will adequately train maintenance staff in the use of appropriate BMP's for work in creeks, including the provision of outreach materials to appropriate contractors and staff (e.g., FishNet 4C "Guidelines for Protecting Aquatic Habitat & Salmon Fisheries for County Road Maintenance." (2000), available at www.mcstoppp.org; and BASMAA's "Flood Control Facility Maintenance Manual," (June 2000). [July 20061
3. Each Local Program will implement appropriate BMP's when performing maintenance activities in or adjacent to a stream channel unless required to do otherwise by emergency flood control procedures. During emergency flood control activities, water quality will be protected to the maximum extent practicable. [March 2008]

I. PREPARE FOR ILLICIT DISCHARGE SCREENING AND INVESTIGATIONS

1. Each agency's Stormwater Coordinator will either be responsible for conducting, or delegating, the following tasks:
   a. Receive information on non-stormwater discharge reports;
   b. Assure that needed follow-up, elimination, and clean up of illicit discharges are conducted;
   c. Provide other staff in his or her agency with information about the status of illicit discharge source identification and elimination. In particular, staff who identify an illicit discharge will be informed about its outcome;
   d. Make sure required reporting is completed;
   e. Distribute information to the agency's management and elected officials, upon their request, about the resources needed to implement these performance standards;
   f. Facilitate the implementation of these performance standards;
   g. Be responsible for sharing local activities and findings with the Agency Staff Committee; and
   h. Promote outreach that provides contact information for reporting an illicit discharge. (Effectiveness evaluation: track number of calls reporting illicit discharges prior to and following outreach to determine if outreach effort results in an increase in reporting.)
2. Train all agency staff who maintain and repair the municipal storm drain conveyance system, and other municipal staff who conduct field work where illicit discharges are likely to occur, to recognize illicit discharges and the procedures for responding to these discharges. Train all new staff who fill positions as described above, about illicit discharge recognition and response procedures.
3. Train agency staff assigned to conduct illicit discharge investigations on the knowledge and skills necessary to be effective. They will be familiar with guidance developed by MCSTOPPP and Water Board staff and these performance standards.
4. Develop maps of outfalls.
5. Develop maps of the complete municipal storm drain system sufficiently accurate to be used for tracing illicit discharges.

II. CONDUCT FIELD SCREENING

1. Identify evidence of illicit discharges to the municipal storm drain conveyance system, using municipal maintenance and other local field staff while they are conducting other routine work.
2. Illicit discharge field screening staff may include contracted staff or consultants working for the agency. Report any evidence of illicit discharges identified during these field screening activities to the Stormwater Coordinator.

III. CONDUCT FIELD INVESTIGATIONS

1. Verify whether an illicit discharge has occurred, using information provided as part of field screening and complaints received from the public or other agencies. The goal will be to initiate follow-up activities within twenty-four hours from the time the Stormwater Coordinator receives the report.
2. When an illicit discharge has occurred, find the source and eliminate it, as possible. Trace the source(s) of the illicit discharge using storm drain maps, inspecting manholes, and making surface observations. Record and maintain findings, as appropriate.
3. Continue to inspect and follow-up illicit discharges until:
   a. The source of the illicit discharge is found and eliminated[2]; or
   b. The discharge has stopped and cannot be traced to a source.
4. If an agency identifies three or more illicit discharges in a fiscal year within an area served by any major outfall[3], additional illicit discharge investigations will be conducted in the area(s) served by the major outfall(s) during the subsequent fiscal year or sooner. These additional investigations will include one or more of the following, as appropriate:
   a. Periodic above ground surveillance of the area for visual evidence of illicit discharges;
   b. Additional inspections of businesses;
   c. Additional periodic investigations of outfalls, creeks, and open channels for evidence of illicit discharges; and/or
   d. Additional targeted educational outreach in the area that is coordinated appropriately with the local Public Information/Participation activities.

[2] Elimination means that the discharge is no longer occurring, has been diverted to the sanitary sewer, or continues to discharge to the municipal storm drain system under an NPDES permit.

[3] Major outfalls are greater than twelve inches in diameter for outfalls serving industrial areas, and thirty-six inches in diameter for outfalls serving all other areas.

IV. FOLLOW-UP TO FIELD SCREENING AND INVESTIGATIONS

1. When a party responsible for an illicit discharge is found, provide the responsible party with
   a. educational information about the impacts of his or her actions,
   b. the requirements of the local stormwater ordinance,
   c. options for proper discharge or disposal, and
   d. educational materials describing BMPs.

   When the source of an illicit discharge has not been found, distribute educational outreach materials to residents and/or businesses located in the immediate vicinity of the illicit discharge.

   If the discharge is traced to a business, the Stormwater Coordinator, or delegated staff, will distribute appropriate educational and BMP information.

   Begin enforcement procedures, if appropriate, as described in Attachment C – *Enforcement Options for Illicit Discharges and Industrial/Commercial Stormwater Pollution Violations*.

   The goal of follow-up investigations will be to stop the illicit discharge(s) as soon as practicable.

V. PROCEDURES FOR SPILL PREVENTION, CONTAINMENT, AND RESPONSE

Since a network of spill prevention, containment, response, and clean up programs already exists, the approach of the MCSTOPPP illicit discharge control program is to supplement these services and respond to spill incidents that are not already under the purview of previously existing clean-up programs. Within this context, each municipality will assure that the following occurs.

1. Each agency's Stormwater Coordinator will either be responsible for conducting, or delegating, the following tasks:
   a. Investigate and record spill reports and/or complaints about incidents within the agency's jurisdiction.
   b. Become familiar with existing spill prevention, containment, response, and clean-up programs that cover the agency's jurisdiction.
   c. Coordinate illicit discharge prevention, elimination, and clean-up activities with existing programs listed in b.
   d. Establish a mechanism for obtaining information about spill incidents from other agencies and departments within the municipality so that source identification and follow-up activities can be coordinated.

VI. DOCUMENT AND REPORT COMPLETION

1. Document the number and types of illicit discharge incidents reported and follow-up investigations conducted within the agency's jurisdiction. (This does not include information from fluid spills from automobile accidents.)
2. Submit complete reports to the Countywide Program including:
   a. Number of screening points monitored;
   b. Number of illicit discharges identified as part of outfall monitoring activities;
   c. Number of illicit discharge reported by other agency staff and the public;
   d. Follow-up activities, as described in the "Report of Non-stormwater Discharge" and "Warning and Order to Abate Pollution" forms.

VII. ALTERNATIVE APPROACHES

1. Although not a preferred alternative, any agency may develop and submit to the Water Board an illicit discharge control and elimination plan that proposes an alternative, but comparably effective approach, to these performance standards for effectively identifying and eliminating illicit discharges. Any such illicit discharge control and elimination plan containing alternative performance standards needs to obtain Water Board staff approval prior to being implemented.

New Development, Redevelopment, and Construction Site Controls

The performance standards for controlling pollutants in stormwater from development, redevelopment, and construction activities are based originally on the Water Board's April 1994 *Staff Recommendations for New and Redevelopment Controls for Stormwater Programs* (*Staff Recommendations*) that incorporated the requirements of U.S. EPA's stormwater regulations as well as the *Coastal Zone Act Reauthorization Amendments*. The performance standards have been modified as needed to meet the additional Phase II General Permit requirements and to incorporate improvements made to improve effectiveness, as appropriate.

These performance standards are intended to achieve a level of water quality protection equivalent to the maximum extent practicable. Agency staff will continue to improve, as appropriate, the performance standards in response to new technical information on effectiveness of control measures, or the update of permit regulations. Implementation of the performance standards and incremental program improvements will be demonstrated in annual report submittals.

I. DEVELOPMENT PLAN REVIEW AND PERMITTING

The performance standards described under this section refer to activities performed by Local Programs during an application's plan review and permitting process.

1. Obtain adequate legal authority to implement stormwater quality control measures for development, redevelopment, and construction activities as part of the development plan review and approval process.
2. Incorporate policies and implementation measures into the General Plan to help preserve and enhance water quality and protect sensitive areas. General Plan amendments will be adopted as part of the agency's next General Plan review cycle.
3. Require environmental documents for projects under the California Environmental Quality Act (CEQA) or National Environmental Policy Act (NEPA) review to address stormwater quality impacts during the life of the project (both significant and cumulative) and specific mitigation measures. These documents include initial study checklists, Environmental Impact Reports (EIRs), negative declarations, and mitigation monitoring plans. Mitigation measures must address both construction stage and post-construction impacts.
4. Require developers and owner/builders to control stormwater quality impacts of their projects by using appropriate BMPs. Require projects with significant stormwater pollution potential to mitigate impacts through site planning or design practices and/or post construction controls. For such projects, the developer and owner/builder will avoid, minimize, and mitigate, in that order, the potential adverse impacts to water quality.
5. Require developers and owner/builders to control stormwater quality impacts of their projects by using appropriate BMPs during construction activities.
6. Require developers and owner/builders of projects with potential for significant erosion[4] and planned construction activity during the wet season[5] to prepare and implement an effective erosion and sediment control plan, or similar document, prior to the start of the wet season.
7. Require developers and owner/builders of projects that disturb a land area of one acre or more to demonstrate coverage under the State Construction Activity Stormwater General Permit.
8. Ensure municipal capital improvement projects also include stormwater quality control measures during and after construction, as appropriate for each project.
9. Require developers and owner/builders of projects that include permanent structural stormwater controls to ensure ongoing operation and maintenance of the controls, as part of project approval documents.
10. Develop and implement standard procedures for receiving and addressing, as appropriate, information submitted by the public regarding performance of construction and post-construction storm water measures and controls. [July 2006]
11. Adopt an ordinance or other regulatory mechanism, as well as sanctions or other effective mechanisms, that would require site planning or design practices and/or post construction controls to protect water quality, such as the controls described in the *Start at the Source* (BASMAA, 1999) manual, for projects that disturb greater than or equal to one acre of land, including smaller projects that are part of a larger common plan of development or sale that would in total disturb one or more acres. [March 2008, Attachment 4 Only (County, Novato, San Rafael)]
12. Adopt an ordinance or other regulatory mechanism or document to ensure implementation of the Phase II General Permit Attachment 4 Design Standards. This includes but is not limited to modifying local codes or other regulatory mechanisms as necessary to resolve conflicts in such a manner that the Design Standards are met at a minimum. [March 2008, Attachment 4 Only (County, Novato, San Rafael)]
13. Should the Local Program elect to do so in lieu of conducting detailed BMP review to verify structural or treatment control BMP adequacy, develop a program to accept signed certification from a Civil Engineer, Licensed Architect, [or Licensed Landscape Architect, if acceptable to the Water Board] that the plan meets the Design Standards criteria. The Program should include verification processes that certifying persons have been trained on BMP design for water quality within the previous two years. The trainings used for certification must be acceptable to the Local Programs. Alternatively, the Local Program should conduct detailed reviews to verify structural or treatment control BMP adequacy. [March 2008, Attachment 4 Only (County, Novato, San Rafael)]

II. ADDITIONAL EROSION AND SEDIMENT CONTROL

1. Maintain an erosion and sediment control program that includes requirements for minimum BMPs, sufficient enforcement authority, training and tools for inspectors, and information for developers and contractors.
2. As a condition for issuing a grading permit, require developers and owner/builders to prepare, submit for review and approval, and implement an effective erosion and sediment control plan, or similar administrative document that contains erosion and sediment control measures.

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[4] Significant erosion potential is a substantial or potentially substantial adverse change in site conditions that could result in erosion and/or sedimentation of site soils. This is consistent with the CEQA definition of significant. Conditions created by land disturbance activities that require a grading permit, as defined by local ordinance, can be used as a threshold for significance.

[5] The wet season is defined as October 15 to April 15, or as defined by local ordinance.

III. ADDITIONAL POST-CONSTRUCTION CONTROLS

1. Determine those structural and/or non-structural BMPs that are appropriate for your community, including but not limited to, infiltration BMPs. [July 2007]
2. Through a post-construction inspection process, require that property owners properly operate and maintain post-construction controls over the life of the project to prevent general ineffectiveness of the control and illicit discharges to the storm drains and watercourses. [March 2008]
3. Require that the applicant provide verification of maintenance provisions through such means as may be appropriate (e.g., legal agreements, covenants, CEQA mitigation requirements, Conditional Use Permits). The verification must include the developer's signed statement regarding responsibilities for structural and treatment control BMP maintenance. [March 2008, Attachment 4 Only (County, Novato, San Rafael)]
4. Provide printed educational materials regarding operation and maintenance requirements to accompany the first deed transfer. [March 2008, Attachment 4 Only (County, Novato, San Rafael)]
5. Require that post-construction treatment control BMPs incorporate, at a minimum, either a volumetric or flow based treatment control standard, as indicated in the Phase II General Permit Attachment 4 requirements. [March 2008, Attachment 4 Only (County, Novato, San Rafael)]

IV. CONSTRUCTION INSPECTION

1. Through a construction inspection process, require that construction contractors properly store, use, and dispose of construction materials, chemicals, and wastes from construction sites and prevent illicit discharges to the storm drains and watercourses.
2. For development projects with significant erosion potential, require that erosion and sediment control measures are implemented through a construction inspection process. Measures will be implemented in accordance with local ordinances and project conditions of approval, including the approved erosion and sediment control plan. Measures will also be maintained as needed during construction.
3. Oversee the inspection of construction sites for adequacy of stormwater quality control measures on a regular basis. This includes inspection of permanent structural control measures, if any. The frequency of inspections will be based on the following criteria:
   a. Project's potential impact on stormwater quality;
   b. Size of the project;
   c. Site topography and soil characteristics;
   d. Season in which the construction phase occurs; and the. nature of the construction activity.
4. Prior to the beginning of the wet season, require that each active construction site be stabilized to minimize erosion and discharges of sediment from disturbed areas. Oversee the inspection of these sites to make sure these requirements are being met.
5. During the wet season, oversee the inspection of all construction sites with erosion and sediment controls following each major storm event.[6]

V. EDUCATION AND OUTREACH

1. Train, at least annually, staff from planning, building, and other public works staff on planning procedures, policies, design guidelines, and BMPs for stormwater pollution prevention and control.
2. Train, at least annually, construction inspection staff on inspection procedures, documentation, and enforcement related to stormwater pollution prevention.
3. Distribute appropriate educational and training materials to agency staff, contractors, construction site operators, developers, and owner/builders such as:
   a. Construction BMPs including erosion and sediment controls;
   b. Available guidance on the State Construction Activity Stormwater General Permit, if applicable;
   c. Site planning or design measures and post construction controls; and
   d. Information provided by Water Board staff regarding State and Federal permit and approval requirements for project activities in wetlands and stream channels.
4. Distribute appropriate educational and outreach materials provided by the Water Board to those utility contractors (water supply, cable, phone, electrical, etc.) seeking encroachment and/or grading permits from the municipality.
5. Train, at least annually, post-construction control inspection staff on inspection procedures, documentation, and enforcement related to stormwater pollution prevention. [July 2007]

[6] A storm or series of storms of such intensity or duration as to create significant quantities of runoff and potential for erosion. A series of storms will be considered one major storm event if there is less than seventy-two hours of dry weather between storms.

VI. ALTERNATIVE APPROACH

1. Any Agency may, through the adoption of the ordinance code, or other regulatory mechanism that incorporates the Design Standard treatment requirements described in Attachment 4 of the General Permit, provide for a waiver from the requirement if impracticability for a specific property can be established for those cases only when all other structured or treatment BMPs have been considered and rejected as infeasible.

   Recognized situations of impracticability include, (i) extreme limitations of space for treatment on a redevelopment project, (ii) unfavorable or unstable soil conditions at a site to attempt infiltration, and (iii) risk of ground water contamination because of known unconfined aquifer lies beneath the land surface. Any other justification for impracticability must be separately petitioned by the Agency and submitted to the Water Board for consideration. The Water Board may consider approval of the waiver justification or may delegate the authority to approve a class of waiver justifications to the Water Board Executive Officer. The supplementary waiver justification becomes recognized and effective only after approval by the Water Board or the Water Board Executive Officer. A waiver granted by an Agency to any development or redevelopment project may be revoked by the Water Board Executive Officer for cause and with proper notice upon petition. [March 2008, Attachment 4 only (County, Novato, San Rafael)]

Industrial and Commercial Discharge Controls

I. TARGETING INSPECTIONS TO ACHIEVE THE MOST BENEFIT

1. Develop and update as needed, a business inspection plan that describes the following:
   a. The inspecting agency/department.
   b. If different from the inspecting agency/ department, the agency/department that will conduct the stormwater follow-up and/or enforcement.
   c. How information will be coordinated among agencies/departments.
   d. Priorities for inspecting businesses. Identify target businesses, if any, with high potential to discharge pollutants to the municipal storm drains.
2. At least once during the five-year *Action Plan* period, inspect and distribute appropriate BMP information to all businesses within the agency's jurisdiction that impact stormwater quality.
3. Inspect and distribute appropriate BMP information to target businesses within your jurisdiction. Frequency of inspection should be commensurate to the businesses' potential to discharge pollutants.
4. Educate business owners and operators about stormwater pollution prevention, separate from the inspection program.
5. Respond to complaints or referrals from other agencies about a facility. The response may include actions such as:
   a. Interviewing the caller concerning the specific nature of the problem;
   b. Referring the caller to the Water Board staff for compliance questions concerning the State Industrial Activities Stormwater General Permit.
   c. Referring the caller to another agency if the facility is outside your jurisdiction;
   d. Calling the facility and providing appropriate BMP information.

   For substantive complaints not covered above, schedule a facility inspection or site visit as soon as possible.
6. Re-evaluate your agency's priorities for inspecting businesses. Update your agency's business inspection plan as needed.

II. PREPARING FOR INSPECTIONS

1. Train facility inspectors so that each inspector possesses the knowledge and skill necessary to conduct effective stormwater inspections. This includes identifying potential pollutant sources that may be exposed to stormwater runoff and non-stormwater discharges to the storm drains.
2. Each agency's Stormwater Coordinator will be responsible for being familiar with the following:
   a. Stormwater regulations and requirements, including the agency's ordinance and the State Industrial Activities Stormwater General Permit;
   b. Impacts of non-stormwater discharges to creeks, bay, and ocean;
   c. Inspection techniques and procedures;
   d. Follow-up and enforcement procedures;
   e. Stormwater BMPs.

   The Stormwater Coordinator will obtain ongoing training to support inspection activities and to continue to improve program implementation.

III. CONDUCTING INSPECTIONS

1. Inspectors will review the facility layout to locate the storm drain system and/or stormwater drainage path.
2. Inspectors will review/inspect the following areas, if access to the area is safe.
   a. Outdoor process/manufacturing areas;
   b. Outdoor material storage areas;
   c. Outdoor waste storage/disposal areas;
   d. Outdoor vehicle and heavy equipment storage and maintenance areas;
   e. Outdoor parking areas and access roads;
   f. Outdoor wash areas;
   g. Surface discharge outlets from rooftop equipment; and
   h. Outdoor drainage from indoor areas.
3. Inspectors will notify the Stormwater Coordinator of potential to discharge pollutants from nonstormwater discharges, and pollutant exposure to stormwater from a business.
4. When a business that impacts stormwater quality is identified, each agency's Stormwater Coordinator will either be responsible for conducting, or delegating the following:
   a. Communicate stormwater requirements.
   b. Distribute to facility representatives appropriate stormwater BMP[7] information, educational materials, and inter/intra-agency referrals as needed. Ask the facility representative whether employees have been trained about how to prevent stormwater pollution.
   c. Inform the facility representative of any problems or violations found. A schedule for correcting problems identified during the inspection, and a means for verifying their implementation will be discussed with the facility representative. This information will be noted and tracked.
   d. Document and track inspection activities, follow-up, and enforcement activities for reporting to the Water Board in annual reports.

The Stormwater Coordinator will be responsible for either conducting, or delegating regular inspections of businesses with historical stormwater issues, to ensure the continued and effective implementation of stormwater BMPs.

IV. ACHIEVING FACILITY COMPLIANCE

1. If a problem is identified during an inspection, the Stormwater Coordinator will either be responsible for performing, or delegating a follow-up site visit or initiating a self-certification process where the facility representative certifies in writing that the problem has been remedied within the time specified by the Stormwater Coordinator.
2. Begin enforcement procedures, if appropriate, as described in Attachment C – *Enforcement Options for Illicit Discharges and Industrial/Commercial Stormwater Pollution Violations*. Enforcement authorities are set forth in the individual municipal ordinances.

V. ALTERNATIVE APPROACH

1. Although not a preferred alternative, any agency may develop and submit to the Water Board a new and redevelopment site design plan that proposes an alternative, but comparably effective approach, to these performance standards for controlling to the maximum extent practicable (MEP) stormwater pollutants from businesses. Any such inspection plan containing alternative performance standards needs to obtain Water Board staff approval prior to being implemented.

Public Information and Participation

The MCSTOPPP has a very active program to develop outreach and educational materials for distribution by Countywide and Local Program staff. MCSTOPPP will continue to use this approach to develop materials regionally. The following performance standards describe the Local Program's role in disseminating this information and conducting outreach and educational activities at the local level.

I. COORDINATION WITH COUNTYWIDE PROGRAM ACTIVITIES

1. The Stormwater Coordinator will be responsible for either conducting, or delegating the following activities:
   a. Stay sufficiently informed about the programs and materials being developed by the Countywide Program by regularly attending Agency Staff Committee meetings.

[7] Stormwater BMPs will effectively eliminate non-stormwater discharges to the storm drains, and reduce pollutant exposure to stormwater to the maximum extent practicable.

b. Distribute outreach and educational materials to appropriate audiences within the agency's jurisdictions. This includes, but is not limited to schools, volunteer committees, neighborhood community groups, and creek monitoring and other environmental groups.

II. INTERNAL COMMUNICATION AND TRAINING

A. City Staff and Officials

1. Identify, develop, and communicate at least annually, information about MCSTOPPP to stormwater staff and elected officials so that they are well informed about the requirements, their role in implementing the local stormwater program, and the progress of the Local and Countywide Programs.
2. Train new employees involved with MCSTOPPP activities on their role in implementing the local stormwater program.

B. Procedures and Training for Handling Telephone Calls from the Public About Stormwater Pollution Prevention

1. Establish procedures for answering, tracking, and efficiently routing stormwater- related telephone calls to the appropriate staff for handling.
2. Train local agency staff assigned to answering or responding to telephone calls on the established procedures.
3. Promote the use of one of the agency's telephone numbers to facilitate public reporting of illicit discharges.

III. STORM DRAIN INLET STENCILS AND SIGNS

1. Each agency will have an active program to install stencils/signs on publicly owned storm drain inlets. This includes installation by municipal staff, contractors, and community groups.
2. As a goal, all stencils and signs will be maintained sufficiently to be legible.

IV. COORDINATION WITH PUBLIC SCHOOLS (K-12)

1. The Stormwater Coordinator will either be responsible for distributing, or delegating the distribution of, information about school based outreach and educational materials developed by the Countywide Program to public schools within the agency's jurisdiction. This may include disseminating information on how to obtain copies of materials.

V. LOCAL COMMUNITY OUTREACH PROGRAM

1. Agencies will participate in community outreach activities from the areas listed below for the purpose of communicating the general stormwater pollution prevention message, complementing the Countywide Program's specific message for target audiences, and facilitating the proper management and disposal of used oil and toxic materials. Each agency will participate in a prescribed number of activities annually, based on the following criteria:
   - Over 50,000 population – each agency participates in at least three activities annually.
   - Between 5,000 and 50,000 – each agency participates in at least two activities annually.
   - Less than 5,000 population – each agency participates in at least one activity annually.

   Community outreach activities conducted by Local Programs will include any combination of the following:
   a. Distributing Countywide Program information through other venues (e.g., local newsletter, local magazine, mailing to target group, web site or network, local telephone directories, etc.).
   b. Participating in existing community events such as fairs, festivals, exhibits, etc. This participation may include setting up a booth, kiosk display, or other creative means for communicating the general stormwater pollution prevention message; using a specific message to a target group; or making a presentation at a local community service group.
   c. Initiating new community events. Play a major role in planning and staging a community or city-wide event. Examples include, but are not limited to, Earth Day, California Coastal Cleanup Day, or other festival or fair, business mixer, seminar or workshop for a target group, or contest.
   d. Developing and raising watershed awareness.
   e. Coordinating with local volunteer groups to conduct outreach.
2. Agencies will consider initiating and supporting a community outreach program.
3. Agencies that have creeks will support their local "friends" of the creek group or conduct an equivalent outreach program.
4. Agencies will focus at least one outreach effort per year on a pollutant(s) of concern within their jurisdiction.